

Message

From: Hambrick, Amy [Hambrick.Amy@epa.gov]
Sent: 9/20/2019 5:33:01 PM
To: iscott@envirotechconsulting.com
CC: Marsh, Karen [Marsh.Karen@epa.gov]
Subject: RE: Form submission from: Stationary Sources of Air Pollution Contact Us About Stationary Sources of Air Pollution form

Iain,

Thank you for your inquiry to EPA's website. Your questions with responses:

(1) onshore well sites with production equipment such as separators, heater treaters, storage tanks, and compressors are subject to Part 60.5420a(b) and not Part 60.5422a(b)?

Well sites with various production equipment (as applicable see 60.5365a) would need to complete the reporting requirements at 60.5420a(b). 60.5422a(b) are additional requirements for natural gas processing plants.

(2) If these facilities are subject to Part 60.5420a(b), is there any initial reporting forms I have to complete or am I to just go in with the Annual Reporting form from the EPA website?

Unless you have to submit a notification as detailed in 60.5420a(a), eg., notification of well completion, you would just go to annual report and you can use the template available on EPA's website.

(3) Lastly, these sites will be for companies that are just now reporting OOOOa reports for wells that are outside of compliance due to confusion over the stay back in 2017, is there any corrective measures that need to be taken?

You may need to contact your delegated authority which would be your Regional EPA office or state (let me know if I can point you to appropriate contact). Since OOOOa remains in effect, you will need to make sure the facilities are meeting the requirements. While this document is now out of date it is still useful to help understand OOOOa and help to come into compliance.

Regards,

Amy

-----Original Message-----

From: drupal_admin@epa.gov <drupal_admin@epa.gov> On Behalf Of Iain Scott via EPA
Sent: Wednesday, September 18, 2019 11:01 AM
To: Pemberton, Wanda <Pemberton.Wanda@epa.gov>
Subject: Form submission from: Stationary Sources of Air Pollution Contact Us About Stationary Sources of Air Pollution form

Submitted on 09/18/2019 11:01AM

Submitted values are:

Name: Iain Scott

Email Address: iscott@envirotechconsulting.com

Comments:

Hello,

I am writing to ask a couple of questions in regard to OOOOa reporting for oil and gas wells with production equipment on site. I wanted to ask to make sure that onshore well sites with production equipment such as separators, heater treaters, storage tanks, and compressors are subject to Part 60.5420a(b) and not Part 60.5422a(b). If these facilities are subject to Part 60.5420a(b), is there any initial reporting forms I have to complete or am I to just go in with the Annual Reporting form from the EPA website? Lastly, these sites will be for companies that are just now reporting OOOOa reports for wells that are outside of compliance due to confusion over the stay back in 2017, is there any corrective measures that need to be taken?

Thank you for your help and time with this matter,

Iain S.